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10 Attorney for Defendant
11 JOSE FERNANDO GOMEZ-MOREIRA

12 IN THE UNITED STATES DISTRICT COURT

13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Case No. 1:20-cr-00151-JLT

16 Plaintiff,

17 v.

18 JOSE FERNANDO GOMEZ-MOREIRA,

19 STIPULATION TO EXTEND
20 COMPASSIONATE RELEASE
21 BRIEFING SCHEDULE;
22 [PROPOSED] ORDER

23 Defendant.

24 The defendant, Jose Fernando Gomez-Moreira, filed a *pro se* 18 U.S.C. § 3582(c) motion
25 on March 3, 2023, and was appointed counsel. A briefing schedule was established where the
26 defendant's counsel filed a supplement to the defendant's motion on July 13, 2023. The
27 government's response is currently due by August 18, 2023, and the defendant's reply is due on
28 September 1, 2023. The government received the defendant's updated Bureau of Prisons'
records on August 15, 2023, and requires more time to review and follow-up on those records
before filing its response.

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1 Therefore, **IT IS HEREBY STIPULATED** between the parties that briefing schedule may be
2 extended as follows:

3 **September 1, 2023:** Government's response to the defendant's motion is due; and

4 **September 15, 2023:** Defendant's reply is due.

5
6 Respectfully submitted,

7 PHILLIP TALBERT
8 United States Attorney

9 DATED: August 16, 2023

10 By: /s/ Joseph Barton
11 JOSEPH BARTON
12 Assistant United States Attorney

13
14 HEATHER E. WILLIAMS
15 Federal Defender

16 DATED: August 16, 2023

17 By: /s/ Laura Myers
18 LAURA MYERS
19 Assistant Federal Defender
20 Counsel for Jose Fernando Gomez-Moreira

21
22 [PROPOSED] ORDER

23 The foregoing Stipulation, by and among counsel for the government and Defendant
24 Gomez-Moreira, is hereby APPROVED.

25
26 IT IS SO ORDERED.

27 Dated: August 16, 2023

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UNITED STATES DISTRICT JUDGE